

**INGA L. PARSONS  
CHRISTIAN J. URBANO\***  
(of Counsel)

Admitted to MA\* NY WY  
Federal Courts  
U.S. Supreme Court

Attorneys at Law  
3 Bessom St. No. 234  
Marblehead, MA 01945

Tel: 781-581-2262  
Fax: 888-406-9538  
Cell: 781-910-1523

Inga@IngaParsonsLaw.com

Christian@IngaParsonsLaw.com

BY ECF

November 7, 2024

Honorable Mary Kay Vyskocil  
United States District Judge  
United State District Court  
500 Pearl Street  
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 11/8/2024
----------------------------------------------------------------------------------

**Re: *United States v. Larry Ramos* 23-554 (MKV)**

Dear Judge Vyskocil:

I am appointed counsel for Larry Ramos. The suppression hearing in this matter is currently scheduled for December 5, 2024. The parties have been involved in extensive negotiations and it is anticipated that a resolution is likely to be finalized. Part of the problem is that there have been difficulties with the Metropolitan Detention Center and now counsel will be out of the country for a wedding in Australia from November 7, 2024 to November 25<sup>th</sup> and then in Boston for some medical appointments through the Thanksgiving holidays.

Defense counsel will be back in New York on November 30, 2024 when she can go see her client again in person (she has had in person meetings and a number of telephone calls although some were cancelled due to MDC lockdowns). In the last call it became apparent that there were some misunderstandings regarding the plea that need to be clarified with the client which is difficult to do by telephone especially given his mental health issues.

Because defense counsel expects a resolution to be reached prior to December 5, 2024 and no suppression hearing would be required, counsel requests that the December 5, 2024 hearing be converted to a status conference with the expectation that it will serve as a likely Rule 11 plea. If a plea is not reached, then the Court can reset the Suppression Hearing to a later date if needed on December 5, 2024.

Finally, the defense has filed a *Bruen* motion to which the government has responded. The defense is not intending to file a reply and requests that the Court rule on the motion which will likely expedite a disposition in this matter.

Hon. Mary Kay Vyskocil  
*U.S. v. Ramos*

November 7, 2028  
Page 2 of 2

The government, by AUSA Alexander Li, consents to these requests.

Respectfully submitted,

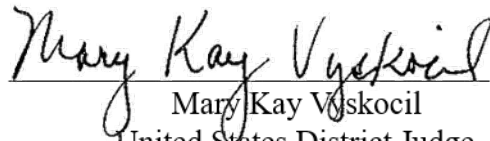
*/s/ Inga L. Parsons*

Inga L. Parsons

Cc: AUSA Li (by ECF)

This request is DENIED. All dates and deadlines remain in place unless and until the parties reach an agreement.

Date: Nov. 8, 2024  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge